

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MS. LISA JONES, MR. TERRY )  
BEASLEY, SR., MS. CHRISTINA )  
BROOKS MR. MICHAEL D. BRYANT, )  
MS. DOMINIQUE DAVIS, MR. STEVEN )  
FORTHENBERRY, ROBERT M. )  
HOSKINS, and MRS. DORA RED )

Plaintiffs, )

v. )

v. )

FIRST STUDENT, INCORPORATED, )  
Defendant. )

Case No. 07 cv 7139

Judge Joan B. Gottschall

Magistrate Judge Maria Valdez

**PLAINTIFFS' MOTION TO ENLARGE DISCOVERY PERIOD SIXTY DAYS**

The Plaintiffs, MS. LISA JONES, MR. TERRY BEASLEY, SR., MS.

CHRISTINABROOKS MR. MICHAEL D. BRYANT, MS. DOMINIQUE DAVIS, MR.

STEVEN FORTHENBERRY, ROBERT M. HOSKINS, and MRS. DORA RED, by their

attorney, Mitchell Kline, move to enlarge the discovery period, and in support thereof states as follows:

1. Lay discovery has been ordered by the Court to be closed by August 18, 2008.
2. During this discovery period eleven written discovery has been exchanged and eleven depositions have been conducted, including each of the eight Plaintiffs.
3. After three of Defendant's witnesses were deposed, Plaintiff's attorney realized that a supplemental request to produce documents was needed and it was served upon Defendant's counsel on August 9, 2008. Exhibit one, Plaintiff's supplemental request to produce documents.

4. Plaintiff's attorney has contacted a process server to serve Mr. Terry Kegley with a subpoena for his deposition; Mr. Kegley supervised all of the Plaintiffs during the time of all of the allegations in their Complaint and he now lives in Texas; and the subpoena states that his deposition will take place on September 15, 2008. Exhibit two, Mr. Kegley's subpoena.

WHEREFORE Plaintiffs respectfully request that their motion to enlarge the lay discovery period sixty days be granted because the supplemental requests and deposition of Mr. Kegley are critical for Plaintiffs to attempt to prove their case, this is the first request for an enlargement, and a trial date has not been set.

Respectfully submitted,

s/ Mitchell A. Kline  
Attorney for Plaintiff  
Law Office of Mitchell A. Kline  
203 N. LaSalle Street, Suite 2100  
Chicago, Illinois 60601  
Telephone: (312) 558-1454  
Fax: 312 346 9603  
E-mail:mitchellakline@aol.com